

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

INNOVATUS CAPITAL PARTNERS LLC.,

Plaintiff,

v.

JONATHAN NEUMAN, ANTONY MITCHELL,
RITZ ADVISORS, LLC, GREG WILLIAMS,
DARYL CLARK, AND AMANDA ZACHMAN,

Defendants.

Civil Action No. 1:18-CV-
04252-LLS

**DECLARATION OF JASON
C. RAOFIELD IN SUPPORT
OF DEFENDANTS' MOTION
TO DISMISS**

**DECLARATION OF JASON C. RAOFIELD IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS**

Jason C. Raofield, being duly sworn, deposes as follows:

1. Plaintiff Innovatus Capital Partners, LLC's Complaint makes reference to and incorporates the terms of the Non-Disclosure Agreement ("NDA") and Term Sheet entered into by Plaintiff and Defendants Jonathan Neuman, Antony Mitchell, and Ritz Advisors, LLC. *See generally* Compl.
2. Attached hereto as Exhibit 1 is a true and correct copy of the Non-Disclosure Agreement ("NDA") and Term Sheet entered into by Plaintiff and Defendants Jonathan Neuman, Antony Mitchell, and Ritz Advisors, LLC.
3. The Complaint alleges that the NDA and Term Sheet entered into between Plaintiff and Defendants Jonathan Neuman, Antony Mitchell, and Ritz Advisors, LLC is substantively similar to those entered into between Plaintiff and the remaining three Defendants, Greg Williams, Daryl Clark, and Amanda Zachman. *See* Compl. ¶¶ 25–38.

Dated: June 5, 2018

Respectfully Submitted,

s/ Jason C. Raofield

Jason C. Raofield (admitted *pro hac vice*)

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